

David N. Cinotti
Partner
dcinotti@pashmanstein.com
Direct: 201.270.4901



November 6, 2023

By ECF

The Honorable Pamela K. Chen
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Nasser v. City Storage Systems LLC
No. 23-CV-06310**

Dear Judge Chen:

This firm represents Defendant City Storage Systems LLC. Pursuant to the Court's order of October 23, 2023, the parties have conferred and respectfully propose the following schedule on Defendant's motion to compel arbitration:

- Discovery regarding Plaintiff's consent to the arbitration clause in the Uber Eats Terms and Conditions to be completed by January 12, 2024;
- Moving papers to be served by February 12, 2024;
- Opposition papers to be served by March 12, 2024; and
- Reply papers to be served and motion papers to be filed by March 26, 2024.

The parties note that some of the discovery will come from nonparty Uber Technologies, Inc. and that they might need to seek an extension of the schedule if that nonparty discovery cannot be completed by the date proposed above.

We thank the Court for its attention to this matter.

Respectfully,

s/ David N. Cinotti

David N. Cinotti

cc: Counsel of record

Court Plaza South
21 Main Street, Suite 200
Hackensack, NJ

Phone: 201.488.8200
Fax: 201.488.5556
www.pashmanstein.com